

**EXHIBIT D**

**(Deposition Transcript of Andy Dillon)**

1           UNCERTIFIED ROUGH DRAFT

2           This is the deposition of Treasurer Dillon.

3           MS. NELSON: This is the for purposes of

4           the record of the Governors deposition that was

5           taken on October 9th. There was a request at the

6           conclusion of the Governors dep for the production

7           of an email which is the transmission email from the

8           Governors office to Kevyn Orr of what was marked as

9           Governor's Exhibit 2 which was his July 18th, 2013

10          letter authorizing the filing of the bankruptcy. I

11          have produced this email and provided it to all

12          counsel that are present today and we have agreed to

13          mark it as Governors Exhibit 11. The email is dated

14 Thursday, July 18th, 2013. It was transmit at 3:47  
15 p.m. and the subject is high priority and the  
16 attachment which is identified as 20130718155044034  
17 dot pdf is identical to the attachment identified in  
18 Governors exhibit 10 that was marked at the  
19 deposition yesterday. And the subject matter I  
20 would point out between Governor's exhibit 11 and 10  
21 is also identical high priority. So the purposes of  
22 the record we're mark this as Governors Exhibit 11  
23 it is the email that was discussed and is now being  
24 produced that was the transmission of the July 18th  
25 letter from the Governors office to Kevyn Orr at 347

1 lead to questions directed to you about your view on

2 in topic. It's relating to the pension issue.

3 Is that a fair characterization of the

4 email?

5 A. Right.

6 Q. In my view it's too early in the process to respond

7 to hypothetical questions we remain in many ways in

8 the informational stage. I have some thoughts as to

9 how you could address some pointed questions if

10 you're interesting in hearing them.

11 What pointed questions were you expecting?

12 A. Anything from -- well, going back in time here but

13 just obviously the whole gamut of questions

14 regarding what the underfunding status to mean to

15 retirees, and I thought that the situation was not

16 understood enough for the Governor to go on record

17 yet because I couldn't even tell him with any degree

18 of confidence what level of funding these pension

19 funds had, so why should he get in the middle of a

20 debate about this. It's obviously very charged and

21 sensitive issue. And it was my free political

22 comments to him.

23 Q. And in was really just over a week before the

24 filing, that was your stance?

25 A. Yeah. Obviously. But I don't -- I think it was in